

# **EXHIBIT H**

1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF NEW YORK  
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5 SECURITIES AND EXCHANGE )  
6 COMMISSION, )

7 Plaintiff, )

8 vs. )

Case No. 1:17-cv-09485

9 PREMIER HOLDING CORPORATION, )  
10 RANDALL LETCAVAGE, and JOSEPH )  
11 GREENBLATT, )

Defendants. )  
\_\_\_\_\_ )

12  
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14  
15 VIDEOTAPED DEPOSITION OF:

16 CONNIE LEE ABSHER

17 Thursday, October 18, 2018  
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19  
20  
21  
22

23 Reported by:  
24 Stephanie Leslie  
25 CSR No. 12893  
JOB No. 181018RCR

03:30:11 1 offices in Laguna Hills on Merit Circle.

2 Q Did Mr. --

3 A No. I'm sorry. Wait a minute. That  
4 wasn't Merit Circle. I believe that was the

03:30:21 5 management company for the Valencia address.

6 Q Did Mr. Letcavage have any relationship  
7 with that company?

8 A Not that I'm aware of.

9 Q Okay. If you go to the page ending in  
03:30:32 10 Bates number 1275, it's a check for \$2,393.31 made  
11 out to Mr. Letcavage, to Randall Letcavage, to  
12 which you're the signatory.

13 Do you know what that check was for?

14 A I don't recall.

03:30:48 15 Q But there's nothing in the memo line;  
16 right?

17 A Correct.

18 Q Just in general, if you didn't put  
19 something in the memo line, how would you be able  
03:31:01 20 to keep track of what the purpose of these checks  
21 were for?

22 A Well, I was thinking about that. Part of  
23 the reason that it wasn't on the memo line is  
24 because it would have been in QuickBooks. There  
03:31:11 25 would have been a better explanation in there, so I

03:32:25 1 A Well, the detail's kind of vague, but I  
2 guess it would be.

3 Q Was there something missing on this hard  
4 copy that was on your QuickBooks on your computer?

03:32:32 5 A Well, I don't know. It's been a while  
6 since I've, you know, looked at QuickBooks, but I  
7 would have thought that there would have been more  
8 explanation.

9 Q What you're -- what you're referring to --  
03:32:40 10 well, strike that.

11 What specifically are you referring to? Show  
12 me some examples of what you are saying is not --

13 A Well, I guess I would have expected there  
14 to be -- I can't remember. You know, I've  
03:32:51 15 worked -- I haven't worked in QuickBooks in a  
16 while.

17 Now, in the accounting software, you can  
18 attach documents. I can't remember if you could attach  
19 documents at this point. So I know that I had -- any  
03:33:05 20 of this stuff, I would have -- if I would have written  
21 a check, I would have made -- like, the bottom of the  
22 check -- I would have kept and attached it to some kind  
23 of hard copy that supported that check.

24 What I don't remember is whether in QuickBooks  
03:33:16 25 I put detail in there or if it was all backed up on

03:33:19 1 hard copy.

2 Q What type of hard document -- let's --  
3 strike that.

4 When you could attach documents -- and we  
03:33:26 5 haven't discussed what time period that is, but --

6 A Right.

7 Q -- when you could attach hard-copy  
8 documents, what types of documents are you  
9 referring to?

03:33:34 10 A Well, bills, you know, of course. The --  
11 this Excel sheet that we had for payroll. I would  
12 have attached that, or I would have at least had a  
13 file folder full of it.

14 Q So, Ms. Absher, we just reviewed a whole  
03:33:49 15 series of documents -- I'm sorry, a whole series of  
16 checks where a lot of them, as we discussed, didn't  
17 have anything on the memo line, say a check to  
18 Mr. Letcavage or to iCapital, where there was  
19 nothing on the memo line.

03:34:00 20 If there was no description in QuickBooks as  
21 to what that payment was for and there's no description  
22 on the check, would there have been another document  
23 that could have been attached?

24 A I believe that there's a file that has  
03:34:15 25 some attachment, some hard-copy attachment for the

03:34:18 1 purpose of the check.

2 Q Okay.

3 A I kept files for pretty much everything.

4 Q Are you aware as to whether or not those  
03:34:27 5 materials that support those payments were turned  
6 over to the SEC --

7 A I'm not.

8 Q -- during the investigation?

9 A Unless you guys asked for it, probably  
03:34:36 10 not. But if you had asked for it, then I would  
11 assume you would have it.

12 Q Were you involved in turning over the  
13 materials to the SEC?

14 A I remember being asked to pull documents.  
03:34:49 15 I don't remember what those documents were.

16 Q Okay. I will just state for the record  
17 that there were specific requests for that -- all  
18 information related to payments --

19 A Okay.

03:34:59 20 Q -- to Mr. Letcavage, for example.

21 A Okay.

22 Q When you say that you were asked to turn  
23 over documents to the SEC -- or to look for  
24 documents for the SEC, who asked you to do that?

03:35:23 25 A I don't recall. Possibly -- I don't

04:09:58 1 Q Do you recall the types of contracts that  
2 you were reviewing?

3 A I don't.

4 Q In other words, were they residential  
04:10:02 5 contracts? Commercial contracts?

6 A I believe both.

7 Q Okay.

8 A I believe both.

9 Q And do you -- do you recall how you got  
04:10:08 10 copies of the contracts?

11 A I don't. I think they might have been  
12 e-mailed to me, I think.

13 Q Was there a Dropbox?

14 A We did have a Dropbox, so it's -- yeah,  
04:10:20 15 it's possible it was in a Dropbox.

16 Q And what made the counting of the  
17 contracts so complicated?

18 A Just because it was in different form -- I  
19 mean -- no, that's not accurate. It was in the  
04:10:29 20 same form, but it was lots of Sheetz of paper, and  
21 it wasn't in a good order, and it was, like, one  
22 here and one there and trying to make sense of it.

23 Q So was it sort of difficult to figure out  
24 if this page went with Contract A or maybe contract  
04:10:44 25 B or what the heck this page was? It was like a --

04:13:21 1 A I don't know that every -- anyone ever  
2 asked me -- or told me that my number matched.

3 Q Do you know if your number of contracts  
4 that you came up with was in the hundreds or  
04:13:31 5 thousands, or do you have any approximation of what  
6 that number was?

7 A I think it was in the thousands, but,  
8 again, it was a long time ago.

9 Q How long did this project take?

04:13:42 10 A Well, if I remember right, I started it,  
11 and then it's like, this isn't making sense, and I  
12 started over. So I don't know. Maybe a couple  
13 days, you know, something like that.

14 Q Did you report the number of contracts  
04:13:57 15 orally to somebody, or did you put it in writing?

16 A I -- let me think about that. I had an --  
17 I'm pretty sure I had it in an Excel sheet, so I  
18 think there was a document created.

19 Q And --

04:14:13 20 A But I'm not confident on that one.

21 Q Is that how you were keeping track, on an  
22 Excel spreadsheet?

23 A Yeah. That's what I'm thinking. They had  
24 it on paper, a lot of different paper forms, and I  
04:14:23 25 think I created -- I just don't remember if I got



04:15:38 1 with the actual collecting of the documents.

2 Q Okay. Did you discuss -- have you  
3 discussed the SEC litigation with anyone?

4 A No. To be perfectly honest, I didn't know  
04:15:51 5 there was a litigation. I just knew there was a  
6 deposition for me to attend.

7 Q Once you -- once you learned that you were  
8 going to attend a deposition here at the SEC, did  
9 anybody suggest to you what your testimony should  
04:16:01 10 be or could be?

11 A No. No.

12 Q Are you aware -- are you aware of any  
13 discussion by other people concerning this matter?

14 A As far as I know, my husband and my kids  
04:16:10 15 are the only ones I know -- well, and the people I  
16 work with know that I'm doing this.

17 Q When was the last time you spoke with  
18 Mr. Letcavage?

19 A Probably about a week before I left. I  
04:16:20 20 haven't spoken since -- to him since we left.

21 MR. SHEETZ: And what year was that?

22 THE WITNESS: 2015.

23 BY MR. ELLENBOGEN:

24 Q Have you spoken with anyone from Anton &  
04:16:33 25 Chia in the last year or so?